

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO: 22-60242-CR-SINGHAL

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TSVIA KOL,

Defendant.

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AGREED MOTION TO CONTINUE SENTENCING

COMES NOW, the Defendant, Tsvia Kol, by and through her undersigned Counsel, Jason W. Kreiss, Esq., and respectfully files this Agreed Motion to Continue Sentencing for a period of 30 days. As grounds for this motion, the defendant states the following:

1. The defendant entered a guilty plea in this matter on August 30, 2023.
2. Sentencing in this matter is currently scheduled for November 16, 2023.
3. There are significant unanticipated issues that have come to light in the PSR that the parties are diligently working together to resolve rather than litigating at the time of sentencing.
4. The defense also requires additional time to procure evidence in support of mitigation pursuant to Title 18 U.S.C. § 3553(a)(1-6). In addition to other issues, as the defendant is an Israeli national, it has been difficult to obtain certain material from Israel that the defendant hopes to utilize at the time of sentencing.
5. Pursuant to Local Rule 88.9(a), undersigned counsel conferred with Assistant United States Alexandra Comolli who is in agreement with the relief sought herein.
6. This request for a continuance is made in good faith and will further the interest of justice.

WHEREFORE, the defendant, Tsvia Kol, respectfully requests that this Honorable Court grant this motion and enter an order continuing the sentencing for hearing in this matter for a period of 30 days.

Respectfully submitted,

/s/ Jason W. Kreiss

JASON W. KREISS, ESQ.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing motion has been furnished by CM/ ECF to all counsel of record on this 1<sup>st</sup> day November 2023.

/s/ Jason W. Kreiss

JASON W. KREISS, ESQ.